

FILED

07 NOV -8 PM 12: 11

CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

JAN

DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIAJanuary 2007 Grand Jury **07 CR 3041 LAB**

UNITED STATES OF AMERICA,) Criminal Case No. _____
 Plaintiff,)
 v.) I N D I C T M E N T
 JOE VANG,) Title 21, U.S.C., Sec. 841(a)(1) -
 aka Khoi Dang Pham,) Possession of Methamphetamine with
 Defendant.) Intent to Distribute;
) Title 18, U.S.C., Sec. 924(c)(1) -
) Possession of a Firearm in
) Furtherance of a Drug Trafficking
) Crime; Title 18, U.S.C.,
) Secs. 922(g)(1) and 924(a)(2) -
) Felon in Possession of Firearm;
) Title 18, U.S.C., Sec. 924(d), and
) Title 28, U.S.C., Sec. 2461(c) -
) Criminal Forfeiture

The grand jury charges:

Count 1

On or about October 6, 2007, within the Southern District of California, defendant JOE VANG, aka Khoi Dang Pham, did knowingly and intentionally possess, with intent to distribute, 50 grams and more, to wit: approximately 110 grams of a mixture and substance containing a detectable amount of methamphetamine, a Schedule II Controlled Substance; in violation of Title 21, United States Code, Section 841(a)(1).

//

PGK:em:San Diego
11/8/07

Count 2

On or about October 6, 2007, within the Southern District of California, defendant JOE VANG, aka Khoi Dang Pham, in furtherance of a crime for which the defendant may be prosecuted in a court of the United States, namely, possession with intent to distribute methamphetamine, the crime charged in Count 1 of this Indictment, did knowingly possess firearms, that is, a 9mm Smith and Wesson semi-automatic handgun, serial number SAE2291; and a .44 caliber ARMI Jager revolver, serial number 41867; all in violation of Title 18, United States Code, Section 924(c)(1).

Count 3

On or about October 6, 2007, within the Southern District of California, defendant JOE VANG, aka Khoi Dang Pham, being a person who had previously been convicted in a court, that is, the Superior Court of California, County of San Diego, of a crime punishable by imprisonment for a term exceeding one year, that is, taking a vehicle without the owner's consent in violation of California Vehicle Code 10851(a) and possession of a controlled substance in violation of California Health and Safety Code 11377(a), did knowingly and unlawfully possess in and affecting commerce a firearm, that is, an FI .380 caliber semi-automatic handgun, serial number CPA029385; in violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

24 //

25 //

26 //

27 //

28

Count 4

2 On or about October 6, 2007, within the Southern District of
3 California, defendant JOE VANG, aka Khoi Dang Pham, being a person who
4 had previously been convicted in a court, that is, the Superior Court
5 of California, County of San Diego, of a crime punishable by
6 imprisonment for a term exceeding one year, that is, taking a vehicle
7 without the owner's consent in violation of California Vehicle
8 Code 10851(a) and possession of a controlled substance in violation
9 of California Health and Safety Code 11377(a), did knowingly and
10 unlawfully possess in and affecting commerce a firearm, that is, a
11 9mm Smith and Wesson semi-automatic handgun, serial number SAE2291;
12 and a .44 caliber APMT Jager revolver, serial number 41867; in
13 violation of Title 18, United States Code, Sections 922(g)(1)
14 and 924(a)(2).

15 //

16 //

17 //

18 //

19 //

20 //

21 / 1

22 | /

23 | 1

24 /

25 / 3

26 /

27 | 7

FORFEITURE ALLEGATION

The allegations contained in Counts 2, 3, and 4 are realleged and by reference are fully incorporated herein to allege forfeiture to the United States of America pursuant to Title 18, United States Code, Section 924(d), and Title 28, United States Code, Section 2461(c).

Upon conviction of the offenses alleged in Counts 2, 3, and 4, knowing violations of Title 18, United States Code, Sections 922(g) and 924, defendant shall forfeit to the United States all firearms and ammunition involved or used in the offense, including, but not limited to, the firearms alleged in Counts 2, 3, and 4.

11 All pursuant to Title 18, United States Code, Section 924(d), and
12 Title 28, United States Code, Section 2461(c).

13 DATED: November 8, 2007.

A TRUE BILL:

Thomas R. Lyon

Foreperson

KAREN P. HEWITT
United States Attorney

19
20 By: 
21 PETER KO
Assistant U.S. Attorney